REMARKS

In accordance with the foregoing, new claims 18-23 have been added. Claims 1-23 are pending, with claims 1, 14, and 18 being independent. No new matter is presented in this Amendment.

New claims 18-23 have been added to recite the invention in different terms.

Request for Acknowledgement of Claim for Foreign Priority and Receipt of Certified Copies of Priority Documents

In the declaration and paragraph [0001] of the specification, the applicants claimed foreign priority benefits of four Korean applications. However, the Examiner did <u>not</u> acknowledge the claim for priority in item 12 on page 1 (the Office Action Summary) of the Office Action of September 28, 2006, or elsewhere in the Office Action of September 28, 2006. Certified copies of the four Korean applications are being submitted herewith. Accordingly, it is respectfully requested that the Examiner acknowledge the claim for foreign priority and receipt of the certified copies in the next Office Action.

Claim Rejections Under 35 USC 102

Claims 1-4, 6-12, 14, 16, and 17 were rejected under 35 USC 102(e) as being anticipated by Tsumagari et al. (Tsumagari) (U.S. Patent Application Publication No. 2003/0161615). This rejection is respectfully traversed.

At the outset, it is noted that the Examiner's approach in explaining the rejection is to state that Tsumagari discloses a particular feature of the claims, followed by a parenthetical reference to one or more portions of Tsumagari that allegedly disclose this feature. However, the Examiner has <u>not</u> explained <u>why</u> she considers these portions of Tsumagari to disclose the claimed features, and this is <u>not</u> apparent from a comparison of that language of the claimed features with the language in these portions of Tsumagari, which makes it difficult for the applicants to respond to the rejection. Accordingly, should the Examiner repeat the rejection of any of claims 1-4, 6-12, 14, 16, and 17 under 35 USC 102(e) as being anticipated by Tsumagari, it is respectfully requested that the Examiner explain <u>why</u> she considers the features of any such

rejected claims to be disclosed by any portions of Tsumagari that may be relied on by the Examiner.

Furthermore, it is noted that Tsumagari is a 61-page reference containing 44 drawing figures, 448 paragraphs, and 20 claims. Claims 1-4, 6-12, 14, 16, and 17 of the present application recite various features related to language in the sense of English, Korean, Japanese, French, German, etc. The only portions of Tsumagari that explicitly relate to language in this sense appear to be paragraphs [0091], [0112], [0115], [0189], [0190], and [0261] of Tsumagari.

Now, turning to the rejection, it is submitted that Tsumagari does not disclose "reading language information indicating a language used with contents contained in interactive data" as recited in independent claim 1. The Examiner considers this feature to be disclosed in paragraph [0112] of Tsumagari which reads as follows:

> [0112] <C> Processor 320 interprets the contents (indicating the current audio language, if the disc playback operation is now being done, and so forth) of a "DVD status signal" which is sent from DVD-Video playback engine 200 and indicates the property of DVD-Video player 100, and converts the contents of the interpreted DVD status signal into a corresponding property signal specified in ENAV contents 30 (30W) (e.g., converts a DVD status signal which indicates that the current audio language is Japanese into a property signal that designates Japanese as a language used by ENAV).

However, paragraph [0112] does not disclose "reading language information indicating a language used with contents contained in interactive data" as recited in claim 1. Rather, paragraph [0112] uses the language "interprets" and "converts." Furthermore, the Examiner has not explained why she considers paragraph [0112] to disclose this feature of claim 1.

As shown in FIG. 1 of Tsumagari, the DVD-Video playback controller 220 outputs the DVD status signal referred to in paragraph [0112] to the event generation·command/property processor 320. As described in paragraph [0091] of Tsumagari, the DVD status signal indicates "property information (e.g., an audio language, sub-picture caption language . . . set in player 100) of DVD-Video player 100." According to paragraph [0112], the event generation·command/property processor 320 "interprets the contents (indicating the current audio language, if the disc playback operation is now being done, and so forth) of a 'DVD status signal' which is sent from DVD-Video playback engine 200 and indicates the property of DVD-

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Video player 100." Assuming *arguendo* that this "interpreting" operation can be considered to be a <u>reading</u> operation, it is submitted that paragraph [0112] discloses <u>reading</u> information <u>set in the DVD-Video player 100</u> indicating a language <u>of audio currently being reproduced by the DVD-Video player 100</u>, rather than "<u>reading</u> language information indicating a language <u>used with contents contained in interactive data</u>" as recited in claim 1.

It is submitted that Tsumagari does <u>not</u> disclose "selecting and reading <u>the interactive data made with the same language as player language information set in the reproducing apparatus</u> with reference to the read language information" as recited in claim 1. The Examiner considers this feature to be disclosed in paragraph [0115] of Tsumagari which reads as follows in pertinent part:

> [0115] As other examples of commands and variables unique to markups or scripts in the ENAV playback information . . . a command and variable used to select an audio language to be used (a command that instructs to change an audio language to be used, and a variable that designates the type of language after change) are used.

Referring to FIG. 1 of Tsumagari, as described in paragraph [0113] of Tsumagari, the ENAV playback information referred to in paragraph [0115] is "contained in ENAV contents 30 acquired from DVD video disc 1 or ENAV contents 30W acquired from the Internet or the like." The Examiner apparently considers Tsumagari's ENAV contents 30 and 30W to correspond to "interactive data" as recited in claim 1. However, it is <u>not</u> seen where Tsumagari discloses anything <u>whatsoever</u> relating to a <u>language</u> of the ENAV contents 30 and 30W. Paragraphs [0372]–[0380] of Tsumagari disclose various elements of the ENAV contents 30 and 30W, but do <u>not</u> disclose anything <u>whatsoever</u> about a <u>language</u> of the ENAV contents 30 and 30W. Paragraphs [0393]–[0397] of Tsumagari describe an ENAV buffer into which portions of the ENAV contents 30 and 30W are loaded for playback. The ENAV buffer is part of the ENAV engine 300 in FIG. 1 of Tsumagari. However, paragraphs [0393]–[0397] do <u>not</u> disclose anything <u>whatsoever</u> about a <u>language</u> of the portions of the ENAV contents 30 and 30W, or loading portions of the ENAV contents 30 and 30W "<u>made with the same language</u> as player language information set in reproducing apparatus" as recited in claim 1.

It is submitted that Tsumagari does <u>not</u> disclose the feature "wherein the reading the language information comprises opening a startup file first read when the interactive mode is selected and reading the language information" recited in dependent claim 2. The Examiner

considers this feature to be disclosed in paragraphs [0430]–[0440] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "language information," or "a startup file," or "opening a startup file first read when the interactive mode is selected" as recited in claim 2. Paragraph [0381] of Tsumagari states that "DVDINDEX.HTM file, XHTML document for start-up may be recorded under DVD_ENAV directory on a disc," and paragraph [0387] of Tsumagari states that "[i]n Enhanced Navigation mode, a player may ignore FP_PGC and may play back DVDINDEX.HTM file for startup in ENAV content on a disc firstly, and then plays back according to the instruction of ENAV content:" However, Tsumagari does not disclose that the DVDINDEX.HTM file for startup contains "language information" as recited in claim 2.

It is submitted that Tsumagari does not disclose the feature "wherein the reading the language information comprises reading language information recorded using an element linking a loading information file included in a corresponding enhanced audio visual (ENAV) application, from a startup file" recited in dependent claim 2. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "a startup file," or "reading language information . . . from a startup file," or "a loading information file," or "language information recorded using an element linking a loading information file " as recited in claim 3.

It is submitted that Tsumagari does not disclose the feature "wherein the reading the language information comprises reading language information indicating respectively the language used in a plurality of ENAV applications, each of which includes substantially similar contents and is made with a different language from the other ENAV applications, in order to reproduce AV data in the interactive mode" recited in dependent claim 4. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "language information indicating respectively the language used in a plurality of ENAV applications, each of which includes substantially similar contents and is made with a different language from the other ENAV applications" as recited in claim 4.

It is submitted that Tsumagari does not disclose the feature "wherein the selecting and reading interactive data comprises finding a system parameter SPRM 0 as player language information that is set according to a DVD-Video standard in the reproducing apparatus" recited

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in dependent claim 6. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "a system parameter SPRM 0 as player language information that is set according to a DVD-Video standard in the reproducing apparatus" or "finding" such a "system parameter SPRM 0" as recited in claim 6.

It is submitted that Tsumagari does not disclose the feature "wherein the selecting and reading the interactive data comprises reading ENAV files belonging to the corresponding ENAV application with reference to a loading information file informing location information of the ENAV files belonging to the corresponding ENAV application" recited in dependent claim 7. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "a loading information file informing location information of the ENAV files belonging to the corresponding ENAV application" as recited in claim 7.

It is submitted that Tsumagari does not disclose the feature "wherein the reading the language information comprises comparing the language information with the player language information and selecting one among a plurality of ENAV applications" recited in dependent claim 8. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "comparing the language information with the player language information and selecting one among a plurality of ENAV applications" as recited in claim 8.

It is submitted that Tsumagari does not disclose the feature "wherein the reading the language information comprises parsing the language information recorded using the element linking the loading information file included in the corresponding ENAV application" recited in dependent claim 9. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about a "loading information file included in the corresponding ENAV application," or an "element linking" such a "loading information file," or "language information recorded using" such an "element," or "parsing" such "language information" as recited in claim 9.

It is submitted that Tsumagari does not disclose the feature "wherein the reading the language information comprising parsing the language information recorded in an element that

stores a condition selecting a linked loading information file, included in the element linking the loading information file" recited in dependent claim 10. The Examiner considers this feature to be disclosed in paragraphs [0112]–[0116], [0425]–[0429], and [0442]–[0447] of Tsumagari. However, these paragraphs do <u>not</u> disclose anything <u>whatsoever</u> about "a loading information file," or an "element linking" such a "loading information file," or "an element that stores a condition selecting a linked loading information file," or "language information recorded in" such an "element," or "parsing" such "language information" as recited in claim 10.

It is submitted that Tsumagari does <u>not</u> disclose the feature "wherein the reading the language information comprising parsing the language information recorded using a "name" property and a "value" property in an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" recited in dependent claim 11. The Examiner considers this feature to be disclosed in paragraphs [0425]–[0429] and [0442]–[0447] of Tsumagari. However, these paragraphs do <u>not</u> disclose anything <u>whatsoever</u> about "a loading information file," or an "element linking" such a "loading information file," or "an element that stores a condition selecting a linked loading information file," or "language information recorded using a 'name' property and a 'value' property in" such an "element," or "parsing" such "language information" as recited in claim 11.

It is submitted that Tsumagari does <u>not</u> disclose the feature "wherein the reading the language information comprises parsing the language information recorded using a "name" property and a "value" property in the element linking the loading information file" recited in dependent claim 12. The Examiner considers this feature to be disclosed in paragraphs [0425]–[0429] and [0442]–[0447] of Tsumagari. However, these paragraphs do <u>not</u> disclose anything <u>whatsoever</u> about "a loading information file," or an "element linking" such a "loading information file," or "language information recorded using a 'name' property and a 'value' property in" such an "element," or "parsing" such "language information" as recited in claim 12.

It is submitted that Tsumagari does <u>not</u> disclose "reading language information from a startup file on the optical disk" as recited in independent claim 14. The Examiner considers this feature to be disclosed in paragraph [0112] of Tsumagari which reads as follows:

> [0112] <C> Processor 320 interprets the contents (indicating the current audio language, if the disc playback operation is now being done, and so forth) of a "DVD status signal" which is sent from DVD-Video playback engine 200 and indicates the property of

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> DVD-Video player 100, and converts the contents of the
> interpreted DVD status signal into a corresponding property signal
> specified in ENAV contents 30 (30W) (e.g., converts a DVD status
> signal which indicates that the current audio language is Japanese
> into a property signal that designates Japanese as a language
> used by ENAV).

However, paragraph [0112] does not disclose anything whatsoever about "a startup file," or such a "startup file" on an "optical disk," or "language information" in such a "startup file," or "reading" such "language information" as recited in claim 14. Paragraph [0381] of Tsumagari states that "DVDINDEX.HTM file, XHTML document for start-up may be recorded under DVD_ENAV directory on a disc," and paragraph [0387] of Tsumagari states that "[i]n Enhanced Navigation mode, a player may ignore FP_PGC and may play back DVDINDEX.HTM file for startup in ENAV content on a disc firstly, and then plays back according to the instruction of ENAV content." However, Tsumagari does not disclose that the DVDINDEX.HTM file for startup contains "language information" as recited in claim 14.

It is submitted that Tsumagari does not disclose "selecting ENAV data based on the read language information" as recited in claim 14. The Examiner considers this feature to be disclosed in paragraph [0065] of Tsumagari which reads as follows:

> [0065] Logically, ENAV contents 30 can be classified into ENAV
> playback information, and the data body of ENAV contents. The
> data body of ENAV contents contains audio data, still image data,
> text data, moving image data, and the like. The ENAV playback
> information contains a markup language, script language, or the
> like, which describes playback methods (display method, playback
> order, playback switch sequence, selection of data to be played
> back, and the like) of the ENAV contents data body and/or DVD-
> Video contents 10.

However, it is submitted that paragraph [0065] does not disclose anything whatsoever about "language information," or "read language information," or "selecting ENAV data based on" such "read language information" as recited in claim 14.

It is submitted that Tsumagari does not disclose the feature "wherein the reproducing comprises reproducing corresponding audio visual data from the optical disk together with the selected ENAV data in a non interactive mode" recited in dependent claim 17. The Examiner considers this feature to be disclosed in paragraphs [0421] and [0445] of Tsumagari. However, these paragraphs do not disclose anything whatsoever about "reproducing corresponding audio

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visual data from the optical disk together with the selected ENAV data in a non interactive mode" as recited in dependent claim 17. Paragraph [0445] discloses an off-line mode M1 which is a non-interactive mode in which only DVD-Video contents are reproduced, an on-line mode M2 which is an interactive mode in which only ENAV contents are reproduced, and a mixed mode M3 which is an interactive mode in which DVD-Video contents and ENAV contents are reproduced.

For at least the reasons discussed above, it is respectfully requested that the rejection of claims 1-4, 6-12, 14, 16, and 17 (i.e., claims 1-4, 6-12, 14, and 17 discussed above and claim 16 depending from claim 14) under 35 USC 102(e) as being anticipated by Tsumagari be withdrawn.

Claim Rejections Under 35 USC 103

Claims 5, 13, and 15 were rejected under 35 USC 103(a) as being unpatentable over Tsumagari in view of Kou (U.S. Patent No. 6,661,466). This rejection is respectfully traversed.

Although the propriety of this rejection is not conceded, it is submitted that claims 5, 13, 15 are patentable over Tsumagari and Kou for at least the same reasons discussed above that claims 1, 3, and 14 from which claims 5, 13, and 15 directly or indirectly depending are patentable over Tsumagari. Accordingly, it is respectfully requested that the rejection of claims 5, 13, and 15 under 35 USC 103(a) as being unpatentable over Tsumagari in view of Kou be withdrawn.

Patentability of New Claims 18-23

It is submitted that Tsumagari and Kou do not disclose or suggest

a method of reproducing audio-visual data in an interactive mode supported by interactive data associated with the audio-visual data, the interactive data comprising a plurality of interactive data respectively corresponding to a plurality of different natural languages, the method comprising:

reading language information specifying the plurality of different natural languages of the plurality of interactive data;

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reading one of the plurality of interactive data corresponding to a selected one of the plurality of different natural languages specified by the read language information; and

interpreting and executing the read one of the plurality of interactive data

as recited in new independent claim 18, or the feature

reproducing a portion of the audio-visual data associated with the interpreted and executed one of the plurality of interactive data

recited in new dependent claim 19 in combination with features recited in claim 18 from which claim 19 depends, or the feature

wherein the reading of one of the plurality of interactive data comprises:

selecting one of the plurality of different natural languages specified by the read language information that is the same as a natural language specified by language information stored in a reproducing apparatus that is performing the method; and

reading one of the plurality of interactive data corresponding to the natural language specified by the stored language information

recited in new dependent claim 20, or feature

wherein the natural language specified by the stored language information is a natural language that was specified by a user of the reproducing apparatus

recited in new dependent claim 21, or the feature

wherein the stored language information is language information specifying a natural language of a menu of the reproducing apparatus, or a natural language of an audio stream to be reproduced by the reproducing apparatus, or a natural language of a caption to be reproduced by the reproducing apparatus, or a natural language of the interactive data to be read in the reading of one of the plurality of interactive data

recited in new dependent claim 22, or the features

wherein the interactive data further comprises:

a plurality of loading files respectively corresponding to the plurality of different natural languages of the

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plurality of interactive data, each of the loading files specifying an interactive data file corresponding to a respective one of the plurality of different natural languages; and

a startup file listing the plurality of loading files in association with the language information identifying the plurality of different natural languages of the plurality of interactive data;

wherein the reading of the language information comprises reading the startup file and identifying the interactive data file corresponding to each of the plurality of different natural languages of the plurality of interactive data; and

wherein the reading of one of the plurality of interactive data comprises reading the interactive data file identified in the reading of the language information as corresponding to the selected one of the plurality of different natural languages

recited in new dependent claim 23.

For at least the foregoing reasons, it is submitted that new claims 18-23 are patentable over Tsumagari and Kou, and an indication to that effect is respectfully requested.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.
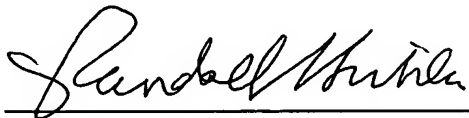
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this paper, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

STEIN, MCEWEN & BUI, LLP

Date: __12/28/06__   By: _____

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